REMARKS

In the Office Action dated January 12, 2006, claim 1 was rejected under 35 U.S.C. § 102 over U.S. Patent No. 5,727,146 (Savoldi); claims 2-6 were rejected under § 103 over Savoldi in view of U.S. Patent No. 6,928,082 (Liu); claims 16, 17, 21, and 24 were rejected under § 103 over Savoldi in view of U.S. Patent No. 6,744,767 (Chiu); and claims 22 and 23 were rejected under § 103 over Savoldi in view of Liu and Chiu.

Applicant acknowledges the allowance of claims 7-13, 19, and 25.

Amended independent claim 1 is allowable over Savoldi, which does not disclose determining whether a data unit contains an identifier of a codec type that matches a stored codec type, and indicating occurrence of an attack of the first network in response to determining that the identifier is of a codec type that does not match the stored codec type.

Claim 4 has been cancelled to render the rejection of the claim moot.

Claim 5 is allowable over the asserted combination of Savoldi and Liu. Claim 5 recites receiving a data unit containing a source address indicating a source of the data unit; matching, by an address filter, the source address with information stored in the system; enabling, by the address filter, entry of the data unit to the first network if the source address matches the information stored in the system and denying entry of the data unit to the first network if the source address does not match the information stored in the system; and determining, by a protocol filter, if the data unit contains a payload according to a predetermined protocol; and denying, by the protocol filter, entry of the data unit if the data unit does not contain payload according to the predetermined protocol.

The Office Action conceded that Savoldi does not disclose the last clause of claim 5. Instead, reliance was made on Liu as disclosing a payload according to a predetermined protocol (real-time protocol). Specifically, the Office Action cited column 6, lines 37-43, of Liu, which states that an initiating Internet client and terminating Internet client exchange compressed voice data utilizing RTP media datagrams. However, there is absolutely no suggestion in this passage of Liu, or anywhere else in Liu or in Savoldi, of denying, by a protocol filter, entry of a data unit if the data unit does not contain payload according to the predetermined protocol. Therefore, since the hypothetical combination of Savoldi and Liu does not teach or suggest at least the last

clause of claim 5, it is respectfully submitted that a *prima facie* case of obviousness of claim 5 cannot be established.

Independent claim 16 was rejected as being obvious over Savoldi and Chiu. The Office Action conceded that Savoldi does not disclose determining if a rate of incoming data units from an external network to the first network exceeds a predetermined threshold in a given call session, and performing a security action if the determined rate of incoming data units exceeds the predetermined threshold. Instead, the Office Action relied upon Chiu as disclosing the subject matter that the Office Action stated was missing from Savoldi. Note, however, that Chiu is completely different from what is recited in claim 16. Chiu describes a resource reservation system that checks to determine if sufficient bandwidth resources are available along a data flow pathway requested by a customer for a particular class of service. Chiu, 2:21-24. The passage in column 5 cited by the Office Action refers to a communication sensing mechanism that is capable of sensing the topology of the communication network including router parameters and characteristics. The cited passage also refers to a controller that is capable of scheduling transmission of packets across the communication network, and a bandwidth allocation device that is capable of allocating and reserving sufficient bandwidth according to a preselected scheme corresponding to service classifications. The cited passage also refers to a memory buffer to buffer certain service classification packets to maximize the probability of packet delivery for higher classes of packet delivery services.

Note that the resource reservation mechanism and allocation and reserving of sufficient bandwidth, as described in Chiu, have nothing to do with performing a security action, as recited in claim 16. To make clear what the security action refers to, Applicant has added the clause that performing the security action comprises generating a report that an attack is occurring. Neither Savoldi nor Chiu teaches or suggests this feature; therefore, it is respectfully submitted that claim 16 is non-obvious over Savoldi and Chiu.

Independent claim 21 is similarly allowable over Savoldi and Chiu.

Independent claim 17 was rejected as obvious over Savoldi and Chiu. Note that claim 17 recites performing a security action if the determined rate of incoming data units exceeds the predetermined threshold, and that the predetermined threshold is calculated based at least in part on a frame size used in the call session.

The Office Action referred to column 9, lines 48-55, of Chiu as teaching the calculating act of claim 17. Note, however, that the cited passage of Chiu refers to reducing the packet size of a voice over IP packet to reduce delay. There is absolutely no suggestion here that the packet size is used for calculating a predetermined threshold, which predetermined threshold is used for performing a security action if the determined rate of incoming data units exceeds the predetermined threshold. Therefore, since the hypothetical combination of Savoldi and Chiu does not teach or suggest all elements of claim 17, it is respectfully submitted that the claim is non-obvious over Savoldi and Chiu.

Dependent claims, including newly added dependent claim 26, are allowable for at least the same reasons as corresponding independent claims.

In view of the allowability of base claim 21 over Savoldi and Chiu, it is respectfully submitted that the obviousness rejection of claims 22 and 23 over Savoldi, Liu, and Chiu has also been overcome.

Allowance of all claims is respectfully requested. The Commissioner is authorized to charge any additional fees and/or credit any overpayment to Deposit Account No. 20-1504 (NRT.0100US).

Respectfully submitted,

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Dan C. Hu
Registration No. 40,025
TROP, PRUNER & HU, P.C.
8554 Katy Freeway, Suite 100
Houston, TX 77024
Telephone: (713) 468-8880
Facsimile: (713) 468-8883